

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: KAIYUEN LEUNG

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED AN ALLEGATION AGAINST MOS LEUNG, ARISING FROM 9/26/14:

ALLEGATION: OTHER DEPT. RULES/PROCEDURES VIOLATION-(FAILED TO INVESTIGATE WHY SOMEONE FAILED TO SIGN EOT ON THE RETURN ROLL CALL/FAILED TO ENTER RESULTS OF RETURN ROLL CALL)

ACTION TAKEN: A SCHEDULE A COMMAND DISCIPLINE WAS ISSUED.

Disclosure #2:

THE NYPD SUBSTANTIATED AN ALLEGATION AGAINST MOS LEUNG, ARISING FROM 3/6/15:

ALLEGATION: OTHER DEPT. RULES/PROCEDURES VIOLATION- (FAILED TO INVESTIGATE WHY SOMEONE FAILED TO

SIGN EOT ON THE RETURN ROLL CALL)

ACTION TAKEN: A SCHEDULE A COMMAND DISCIPLINE WAS ISSUED.

Disclosure #3:

THE NYPD SUBSTANTIATED AN ALLEGATION AGAINST MOS LEUNG, ARISING FROM 1/20/16:

ALLEGATION: FAIL TO NOTIFY -IAB

Disclosure #4:

THE NYPD SUBSTANTIATED TWO ALLEGATIONS AGAINST MOS LEUNG, ARISING FROM 7/17/19:

ALLEGATION: 1. INVOICE DISCREPANCY - BANK DROP - SHORTAGE (NOT COUNTERFEIT)

ALLEGATION: 2. REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK INVOICE

ACTION TAKEN: VERBAL OF INSTRUCTIONS

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez District Attorney Kings County